

### REMARKS

Favorable reconsideration of this application is respectfully requested.

Addressing first the objections to the drawings, applicants note substitute drawings are submitted herein in which Figs. 4-10B are designated as "Prior Art". With respect to Figure 2, Figure 2 shows a comparison between the operation in the present invention and that in the prior art, and thus Figure 2 is not believed to be properly labeled as "Prior Art" as it shows features of the present invention.

Claims 1-20 are pending in this application. Claims 8 and 15-20 were rejected under 35 U.S.C. § 112, second paragraph. Claims 1-20 were rejected under 35 U.S.C. § 103(a) as unpatentable over applicants' admitted art in view of U.S. patent 6,297,551 to Dudderar et al. (herein "Dudderar").

Addressing now the rejection of claims 8 and 15-20 under 35 U.S.C. § 112, second paragraph, that rejection is traversed by the present response.

Each of claims 8 and 15 is amended by the present response to no longer recite the term "type". Thus, those claims are believed to be in full compliance with all requirements under 35 U.S.C. § 112, second paragraph.

Addressing now the rejection of claims 1-20 under 35 U.S.C. § 103(a) as unpatentable over applicants' admitted art and Dudderar, that rejection is traversed by the present response.

Applicants initially note the claims are amended by the present response to make clarifications therein. Specifically, independent claim 1 is amended by the present response to clarify that the metal plating layer is "selectively formed on said first electrode". That feature is believed to be fully supported by the original specification. For example, at page 9, lines 3-16, the present specification notes that "the metal plating layers 35 and 37 can be

selectively formed only on the AL layer in a region other than a region which is covered with the PI layer”.<sup>1</sup>

The other independent claims 9 and 15 are amended to recite a similar feature as in independent claim 1. Further, certain of the dependent claims are amended to be consistent with the amendments to the independent claims.

The admitted art clearly fails to teach or suggest the structure of a “metal plating layer which is selectively formed on said first electrode layer” as the admitted art does not even disclose or suggest the use of a metal plating layer. To meet the limitations of the “metal plating layer” the outstanding rejection cites the teachings in Dudderar, and particularly at col. 5, lines 4-47. However, applicants respectfully submit that the teachings in Dudderar do not overcome the deficiencies of the admitted art.

Dudderar is directed to a flip-chip IC package with improved electromagnetic interference (EMI) characteristics.<sup>2</sup>

However, Dudderar discloses at column 4, lines 62-65 that the EMI shield metallization is essentially the same as shown in Figure 1 of Dudderar, which “compris[es] metallization 21, solder wall 25, and PCB metallization 27, 27’ and 27’””. As explained in Dudderar at column 2, line 44 to column 3, line 13, Figure 1 of Dudderar shows a flip-chip package into which the EMI shield is incorporated. Further, the metallization 21 provided to the upper side of the packet shown in Figure 1 covers the entire surface of the MCM tile that is normally exposed, i.e. the top and sides. Dudderar specifically states “metallization 21 which covers the entire surface of the MCM tile that is normally exposed, i.e. the top and sides” at column 2, lines 65-67.

From the above-noted descriptions in Dudderar, applicants respectfully submit it is clear that the metal plating layer disclosed in Dudderar functions as an EMI shield and is

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<sup>1</sup> See specifically the specification at page 9, lines 7-10.

<sup>2</sup> Dudderar at col. 1, lines 5-7.

formed on a substrate for the purpose of the EMI shield. Thus, in Dudderar the noted metal plating is not even formed on an electrode.

Moreover, Dudderar clearly discloses the noted metal plating layer is formed on the entire surface of the MCI tile that is exposed, and thus Dudderar does not disclose or suggest a “metal plating layer which is *selectively* formed on said first electrode layer” (emphasis added), as even further clarified in the claims.

In such ways, applicants respectfully submit each of independent claims 1, 9, and 15, and the claims dependent therefrom, patentably distinguish over the combination of teachings of the admitted art and Dudderar.

Applicants also wish to draw attention to dependent claims 5, 12, and 18 that further recite that “said metal plating layer is formed by a wet electroless plating”. Such a further feature provides an advantageous effect that a metal plating process can be carried out in a wafer state, by utilizing the wet electroless plating process. Such a further feature is believed to be neither taught nor suggested by the admitted art or Dudderar. Thus, those claims 5, 12, and 18 are believed to even further distinguish over the applied art.

In view of these foregoing comments, applicants respectfully submit that each of the pending claims distinguishes over the applied art.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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